

GODFREAD LAW FIRM, P.C.

100 South Fifth Street, Suite 1900, Minneapolis, MN 55402

August 1, 2013

Via ECF

Magistrate Judge Franklin L. Noel
U.S. District Court, District of Minnesota
U.S. Courthouse, Suite 9W
300 South Fourth Street
Minneapolis, MN 55415

Re: AF Holdings LLC v. John Doe, 12-cv-1445
AF Holdings LLC v. John Doe, 12-cv-1446
AF Holdings LLC v. John Doe, 12-cv-1447
AF Holdings LLC v. John Doe, 12-cv-1448
AF Holdings LLC v. John Doe, 12-cv-1449

Dear Judge Noel:

I represent Alan Cooper, whose name has been misappropriated by plaintiff AF Holdings, LLC in the above cases, as well as others. I received notice that these cases were being reopened and that a status conference is scheduled to be held in your chambers on August 5, 2013 at 11:00am. I respectfully request permission to attend that status conference on behalf of my client.

I have also received copies of objections filed by Paul Hansmeier and Paul Duffy, which include attacks on myself and my client. Both Hansmeier and Duffy pled the Fifth when called to answer to Judge Otis D. Wright II in the Central District of California on the issue of my client's name appearing on AF Holdings, LLC copyright assignments without my client's knowledge or authorization.¹ Neither Hansmeier or Duffy have yet waived their Fifth Amendment rights and returned to answer Judge Wright. Not only can adverse inferences be drawn from that in civil cases² but they should be precluded from addressing the issue in this Court, while simultaneously refusing to testify in another.

The objections avoid answering who in fact **signed** the assignments for AF Holdings and contain several misstatements of fact and law. I respectfully request leave to file a memorandum in response to these objections.

Sincerely,

s/ Paul Godfread
Paul Godfread

cc: Michael Dugas
Paul Hansmeier
Paul Duffy
Mark Santi

¹ See *Ingenuity13, LLC v. John Doe*, 12-CV-8333 ODW, Doc. #103

² See *Baxter v. Palmigiano*, 425 U.S. 308, 96 S.Ct. 1551 (1976).